

Bradford J. Sandler, Esq. (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Chapter 11

Case No. 20-20230 (PRW)

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Plaintiff,

v.

BIODELIVERY SCIENCES INTERNATIONAL,
INC.,

Defendant.

Adv. Proc. No. 2-22-02011 (PRW)

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc., and defendant, Bidelivery Sciences International, Inc. (“Defendant”, and together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the "Complaint") against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022; and

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint.

The Parties hereby stipulate and agree to the matters set forth below:

1. The time by which Defendant is required to answer the Complaint is extended through and including April 15, 2022.
2. Defendant does not challenge personal jurisdiction and waives any objection to service of process of the Summons and Complaint in this adversary proceeding.

Respectfully submitted,

Dated: February 28, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

Bradford J. Sandler (NY Bar No. 4499877)

Ilan D. Scharf (NY Bar No. 4042107)

Jason S. Pomerantz (CA Bar No. 157216)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Email: bsandler@pszjlaw.com

ischarf@pszjlaw.com

jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

Dated: February 28, 2022

GOODWIN PROCTER LLP

Barry Z. Bazian

Barry Z. Bazian (NY Bar No. 5204052)

The New York Times Building

620 Eighth Avenue

New York, NY 10018

Telephone: (212) 813-8816

Email: BBazian@goodwinlaw.com

Counsel to Defendant Bidelivery Sciences International, Inc.

SO ORDERED:

DATED: _____, 2022
Rochester, New York

HON. PAUL R. WARREN
United States Bankruptcy Judge